

## Meeting with FAA Administrator Marion Blakey

**November 5, 2002**

**Re: Domestic Reduced Vertical Separation Minimum (DRVSM)**

**Docket # FAA-2002-12261**

Representing the Coalition of Airline Pilots Associations (CAPA):

Captain Michael Cronin, CAPA Executive Director

Captain John Darrah, President, Allied Pilots Association (American Airlines)

Captain Wayne Stamps, Southwest Airlines Pilots Association (Southwest Airlines)

Captain Sean Sullivan, President, National Pilots Association (AirTran)

Captain Neil Frey, Teamsters Local 1224 (Airborne Express)

Susan Williams and Linda Flaherty, Williams, Aron and Associates

One of the items discussed was DRVSM. As this topic is the subject of a pending rulemaking, a written summary that CAPA prepared and presented to the Administrator in connection with the meeting follows:

This summer, the FAA issued a notice of proposed rulemaking that would bring RVSM to United States domestic airspace. CAPA objects to that proposal because it would not require participating aircraft to be TCAS equipped.

The FAA has yet to issue final rules requiring cargo aircraft to be TCAS equipped. The NPRM on that subject was somewhat belatedly issued last fall in response to legislation. There are also other categories of aircraft that would be operating in the proposed RVSM airspace without TCAS. The U.S. airspace is the busiest in the world, and we don't think this is a prudent step. We do agree that RVSM might do much to reduce congestion and improve efficiency. We believe those improvements come at a cost. That cost is TCAS for all participants.

The hazards of having only some aircraft equipped with TCAS in RVSM airspace are illustrated vividly by the recent mid air collision in Switzerland. That accident took place in RVSM airspace. Both aircraft were TCAS equipped, but one aircraft elected to follow ATC instructions rather than respond to TCAS warnings, while the other aircraft initiated a maneuver in response to a TCAS warning. ATC appears to have been in error as was the pilot who did not follow TCAS. The result was exactly what would have happened if only one of the aircraft had had TCAS. The aircraft that did not respond to its TCAS warning behaved just as it would have had it not been TCAS equipped. A strikingly similar incident (near miss) happened in Japan around the same time. We believe TCAS must be installed and followed by all aircraft in RVSM airspace.